REMARKS

Applicants have now had an opportunity to carefully consider the Office Action of April 20, 2007.

Applicants have canceled claims 16-34, and added new claim 38. These amendments are made to focus the discussion with the Patent Office, as well in anticipation of the new Rules.

The Office Action

Initially, Applicants note what appears to be an inconsistency in the Office Action. Particularly, in paragraph 3, the statement is made that certain rejections are removed (*i.e.*, to claims 1-32, 33-34 and 37) in view of the arguments and/or amendments made.

However, then in paragraph 11 (page 14) it is stated the arguments filed December 22, 2006 have been fully considered but they are not persuasive.

Applicants believe, for these reasons, the arguments presented in the Office Action of December 22, 2006 do distinguish the claims set forth therein from the cited art, and therefore continue those arguments and reasoning.

However, to move the prosecution forward, Applicants are providing additional changes to the claims, to further clarify distinctions existing from the cited art.

The Remaining Claims Are Distinguished
From The Cited Art

Turning to paragraph 13 (page 15) of the Office Action, it is stated Allen 1 teaches the concept of source-identified stories in Section 2.1: The Corpus. It is argued Allen 1 teaches source-identified stories due to the language discussing 16,000 stories, with half from *Reuters* newswire and half from CNN broadcasts. However, continued reading this section shows that, Allen 1 states, "[i]n addition, the segmentation task must be performed without <u>explicit knowledge of the source of the text</u>, whether from newswire or transcribed speech."

It is submitted this language explicitly teaches that even if the source is identified in Allen 1, it is not used in the process described in Allen 1.

In other words, the Office Action takes identification, in the background description of the article, of where articles which comprise the article database are from,

and then makes a leap to say it is used in the process that is described by the reference (*i.e.*, Allen 1). This cannot be supported in view of Allen 1's own words.

This is similar to the citation in Lavrenko which is pointed to as teaching a source of the identified stories (see the Office Action at page 14, paragraph 12). In this discussion of the Office Action, Section 4.1.1 of Lavrenko is cited as disclosing source-identified stories. However, again reading this section, all that is being stated here is background information for the reader to understand where the documents which make up the data set came from. This is clearly shown by the heading of Section 4.1, which is entitled, "Experimental Setup." However, this discussion in Lavrenko has nothing to do with the actual matching process.

On the other hand, as re-cited in independent claim 1, the "source-identified story corpus" and the "source-identified new story" are part of the operation of the method set forth in claim 1, and the concepts of the present application.

Therefore, even if "source-identified story" is taken in its broadest meaning, that meaning provides no teaching of its use as in claim 1, and as noted in Allen 1, it is explicitly excluded.

Turning to the rejection of claim 2, Applicants have reviewed Section 4.3, Relevance Model Performance of Lavrenko. We note the statement, ". . . we use symmetric clarity – adjusted KL as a measure of divergence." It is understood the discussion in Lavrenko is to explain models which may be desirable. However, what is not shown here is the flexibility of the present application, where such adjustments may be done dynamically or automatically. On the other hand, in the present application, paragraph [0034], it is specifically stated that the "new event detection system 100 allows for determining dynamic and selective adjustments to the inter-story similarity metrics based on story characteristics . . .."

For at least this reason, it is submitted claim 2 is distinguished.

With attention to claim 35, Applicants respectfully submit the arguments and discussions related to the source-identified subject matter is equally applicable to this claim. Further, the further amendment of identifying that the event frequency model will periodically automatically updated, is also added to further define this claim.

Lastly, new claim 38 further defines the aspects of the subject matter not taught or fairly cited in the prior art.
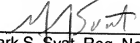
CONCLUSION

For the reasons detailed above, it is submitted all claims remaining in the application (Claims 1-15, 35-38) are now in condition for allowance. An early notice to that effect is therefore earnestly solicited.
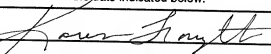
In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call Mark S. Svat, at Telephone Number (216) 861-5582.

Respectfully submitted,

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_9/20/07_
Date

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